UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

In re:

Chapter 11

TWIN RINKS AT EISENHOWER, LLC

Case Nos. 15-72466 (REG)

Debtor.

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appears in the above-captioned case on behalf of Blumenfeld Development Group, Ltd. ("BDG"), a party-in-interest, and pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and section 1109(b) of the Bankruptcy Code, demands that all notices given or required to be given and all papers served in this case be delivered to and served upon the party identified below at the following address:

Kristin S. Elliott, Esq. Kelley Drye & Warren LLP 101 Park Avenue New York, New York 10178

Tel: 212-808-7800 Fax: 212-808-7987

E-mail: KDWBankruptcyDepartment@kelleydrye.com

kelliott@kelleydrye.com

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in this case.

Case 8-15-72466-reg Doc 32 Filed 06/15/15 Entered 06/15/15 13:59:53

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive BDG's: (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the BDG is or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: New York, New York June 15, 2015

KELLEY DRYE & WARREN LLP

By: /s/ James S. Carr
James S. Carr, Esq.
Kristin S. Elliott, Esq.
101 Park Avenue
New York, New York 10178

Tel: 212-808-7800 Fax: 212-808-7897

Counsel to Blumenfeld Development Group, Ltd.